

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN**

SAHI COSMETICS L.L.C.,

*Plaintiff,*

v.

REA.DEEMING BEAUTY, INC. D/B/A  
BEAUTYBLENDER

*Defendant.*

CASE NO.:

JURY TRIAL DEMANDED

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<https://www.detroitnews.com/story/business/careers/professional-development/2018/05/24/detroit-downtown-spring-markets/642250002/>.

Exhibit B- Kelly Kovack, Target Takeoff Accelerator 2019: 10 Emerging Beauty Brands, BeautyMatter (Feb. 8, 2019), <https://beautymatter.com/2019/02/target-takeoff-accelerator-2019-10-emerging-beauty-brands/>.

Exhibit C- Deanna Utroske, Sahi Cosmetics Participating In University of Michigan's Desai Accelerator, Cosmeticsdesign.com (Jan. 25, 2017),  
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Exhibit D- Sarah Schmid Stevenson, Sahi Cosmetics Offers Science-Backed Products For Olive Skin Tones, Xconomy (Sept. 6, 2017), <https://xconomy.com/detroit-ann-arbor/2017/09/06/sahi-cosmetics-offers-science-backed-products-for-olive-skin-tones/>.

Exhibit E- Tom Henderson, UM Fund Invests \$100,000 in Cosmetics Startup, Crain's Detroit Business (Aug. 24, 2017, 7:36 AM),  
<https://www.crainsdetroit.com/article/20170824/news/637171/um-fund-invests-100000-in-cosmetics-startup>

Exhibit F- Annalise Frank, Wireless Audio, Health Care Platform Among 2<sup>nd</sup> Round of Desai Accelerator Program This Year, Crain's Detroit Business (Jul. 17, 2017, 11:54 AM), <https://www.crainsdetroit.com/article/20170717/news/634056/wireless-audio-health-care-platform-among-2nd-round-of-desai>

Exhibit G- Tyler Clifford, Sahi Wins \$100,000 in Rise of the Rest Pitch Competition, Crain's Detroit Business (Oct. 12, 2017, 7:28 AM), [https://www.crainsdetroit.com/article/20171012/news/641871/sahi-cosmetics-wins-100000-in-rise-of-the-rest-pitch-competition#:~:text=Shelly%20Sahi%20\(center\)%2C%20founder,Sahi%20said%20in%20an%20email](https://www.crainsdetroit.com/article/20171012/news/641871/sahi-cosmetics-wins-100000-in-rise-of-the-rest-pitch-competition#:~:text=Shelly%20Sahi%20(center)%2C%20founder,Sahi%20said%20in%20an%20email).

Exhibit H- Laura Cassar, 20 In Their 20s 2019: Sheleen Sahi, 29 CEO & Founder, Sahi Cosmetics, Crain's Detroit Business, <https://www.crainsdetroit.com/awards/sheleen-sahi-2019-20-20s>.

Exhibit I- Amanda Ostuni, Target Attracts 10 Beauty Startups For Third-Annual Target Takeoff Accelerator Program, Twin Cities Business (Jan. 30, 2019), <https://tcbmag.com/target-attracts-10-beauty-startups-for-third-annual-target-takeoff-accelerator-program/>.

Exhibit J- Sarah Rigg, Cosmetics Company Wins Best Business at Michigan Business Challenge, concentrate (Feb. 22, 2017), <https://www.secondwavemedia.com/concentrate/innovationnews/sahicosmetics0399.aspx>.

Exhibit K- Sahi Cosmetics L.L.C. Instagram Posts showing Sahi Cosmetics L.L.C. Pop-Up Store at Macy's in Westminster, California (Apr. 2, 2019), <https://www.instagram.com/stories/highlights/17867984602356826/>.

Exhibit L- Email from Sakija Wilkinson, MBDA Research Analyst & MMSDC Customer Service Coordinator, Mich. Minority Supp. Development Council, to Sheleen Sahi, CEO & Founder of Sahi Cosmetics (Aug. 23, 2019, 9:57 AM) (on file with Plaintiff).

Exhibit M- FabFitFun Fall 2019 Edit Sale Spoilers!, Hello Subscription (Sept. 28, 2018), <https://hellosubscription.com/2018/09/fabfitfun-fall-2018-edit-sale-spoilers/>.

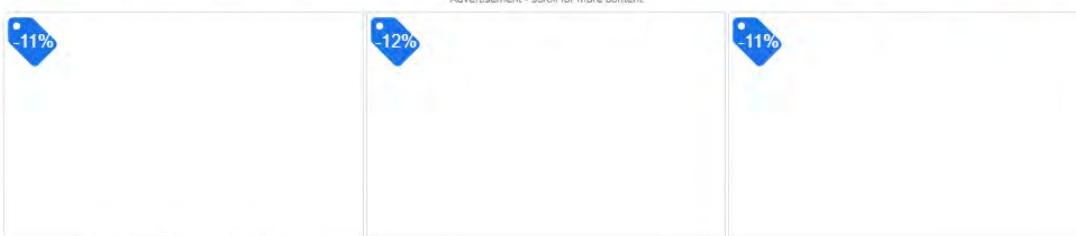
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## **EXHIBIT A**

# The Detroit News

**BREAKING NEWS:** Michigan begins paying extra \$300 to state's unemployed X

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PROFESSIONAL DEVELOPMENT

## Downtown spring markets celebrate small businesses

Sarah Rahal The Detroit News

Published 11:27 p.m. ET May 24, 2018 | Updated 12:55 a.m. ET May 25, 2018

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Paisley Paper Co. in Capitol Park makes cards and paper goods. Sarah Rahal, The Detroit News

The tiny glass-house markets are back in full swing for spring, celebrating local entrepreneurship at three markets in downtown Detroit.

After the success of 30 unique vendors in the holiday markets this past winter, Bedrock and the Quicken Loans companies launched the spring version with expansions.

The first phase of market vendors opened Thursday with more than 30 Detroit-based entrepreneurs. The vendors include products from apparel and accessories to food and drinks spread throughout 1441 Woodward Collective, Capitol Park and Cadillac Square.

Ashley Gold, formerly associated with the reality show "Hardcore Pawn," started her handmade jewelry brand, which launched at the holiday market. She returns this spring to Cadillac Square after nearly doubling her business revenue through the market.

"As a result of last winter, we saw more than a 40 percent increase in sales, so of course, when there was an opportunity to return, we were all in," Gold said. "We're looking forward to the foot traffic and raising awareness of our brand."

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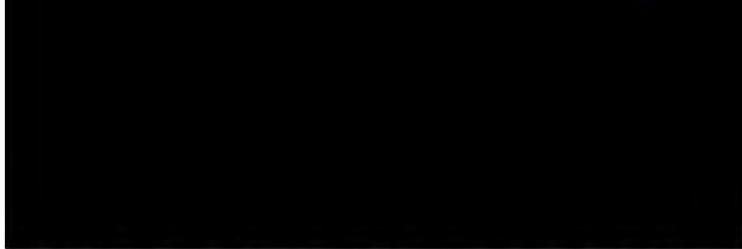
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Ashley Gold in Cadillac Square returns after the holiday markets with more handmade jewelry. *Sarah Rahal, The Detroit News*

Officials said this spring, more than half of the vendors are minority- and women-owned. The second phase of vendors will be announced mid-summer.

During the outdoor winter markets, customers escaped the cold into the heated glass shops. On opening day Thursday, Detroit had a high of 82 degrees, and it was hotter inside the glass shops. Some shops, including those selling cosmetics and food, closed for the day after products began melting.

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"I bought an AC unit for the 10-foot space because it's like a greenhouse effect in there," said Steve Mansour, owner of Ink Detroit apparel brand. "We're mainly online and this helps us attract more retail customers and new people who want to see and touch the product before buying online ... It's a little toasty, but I think if people came out in the blizzard, they'll come when it's sunny."

The Cadillac Square Beer Garden will open Friday in the same location as the former Cadillac Lodge. Central Kitchen and Bar will serve cocktails, wine, frozen drinks and beer from Atwater Brewery and Great Lakes Beverage Co. The Garden will be open noon to 11 p.m. Tuesday-Thursday; 11 a.m. to 7 p.m. Friday-Saturday; and noon to 8 p.m. Sunday.



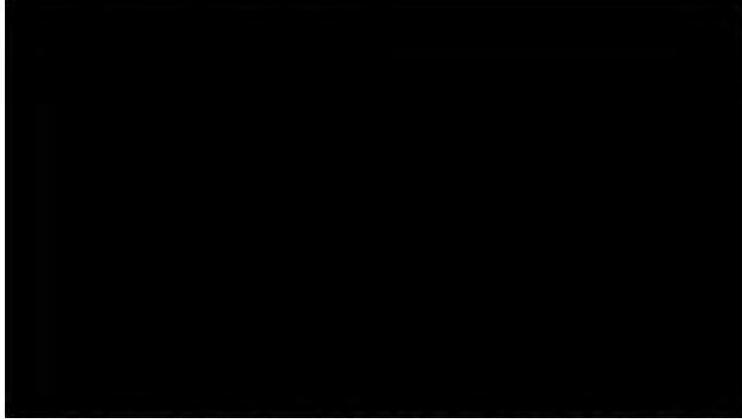
Cadillac Beer Garden opens Friday in Cadillac Square. *Sarah Rahal, The Detroit News*

The following markets are open through July 1.

**1441 Woodward Collective**

- **Fly Behavior** - Women's clothing
- **Detroit GT** - Detroit apparel brand
- **Ferne Boutique** - Women's clothing
- **David Vintage** - Men's and women's streetwear
- **MATURE** -Men's products and attire
- **Mira Estell** - Handbags and accessories
- **Purpose Planner** - Stylish stationery
- **Elaine B** - Handmade jewelry
- **Goldeluxe** - Handmade jewelry
- **Pingree Detroit** - Leather and hemp totes
- **Front & Scenter** -Home sensory impressions
- **12th & VIV** - Handmade candles, creams and scrubs
- **Beau Dillion** - Bow-ties

Open 11 a.m. to 7 p.m. Tuesday-Sunday

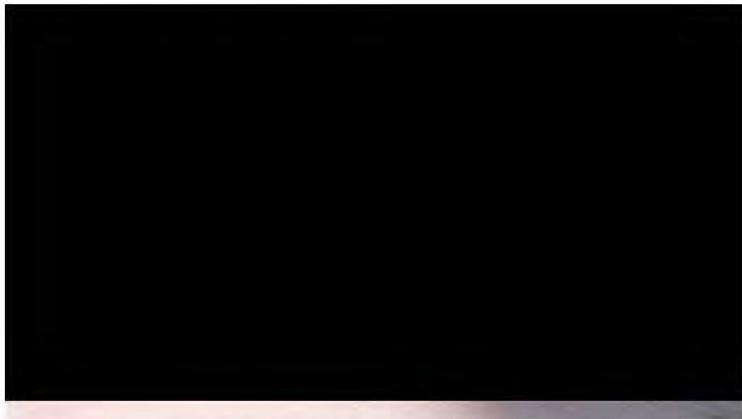


Capitol Park features more than 10 popup shops and food carts Tuesdays through Sundays. *Sarah Rahal, The Detroit News*

#### Capitol Park

- **Well Done Goods** - Detroit apparel
- **Merit** - Clothing and accessories that help fund college scholarships
- **Le Detroit Macaron** - Taste of France in Detroit
- **Dale & Blue** - 100 percent linen dyed by hand
- **SAHI Cosmetics** - Luxury makeup for ethnic skin tones
- **Paisley Paper Co.** - Cards and paper goods
- **Pewabic Pottery** - Handcrafted ceramic art
- **Touch** - Natural skincare and hair care
- **Detroit Dough** - Edible cookie dough
- **Susan's Tarts** - Lemon tarts

Open 11 a.m. to 7 p.m. Tuesday-Sunday



Cadillac Square Markets return for spring-summer markets through July 1. *Sarah Rahal, The Detroit News*

#### Cadillac Square

- **Ink Detroit** - Detroit apparel
- **Ashley Gold** - Handmade, fashionable jewelry

- York - Streetwear that donates kits to homeless

- **Flamingo Vintage** - 1920s Men's and women's clothing and accessories
- **Albert's General Store** - Curated Michigan home décor, gifts and clothing
- **Motor City Popcorn** - Gourmet popcorn
- **Made in Detroit** - Apparel for Detroiters

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## **EXHIBIT B**

## TARGET TAKEOFF ACCELERATOR 2019: 10 EMERGING BEAUTY BRANDS



By Kelly Kovack Posted February 8, 2019 In Brands, Insight, Retail

0

The Target Takeoff Accelerator has a product-centric focus and an abbreviated five-week format to provide emerging brands an opportunity to deepen their retail know-how. The program consists of virtual and face-to-face workshops and mentoring aimed at helping young brands scale and accelerate their market readiness.

This year's [10 emerging beauty participants](#) in the program:

1. [Allyoos](#): Innovative haircare that works on all hair types, known for its clean-ingredient product. Their hero products are a one-step wash and strand soak.
2. [Black Chicken Remedies](#): A popular Australian brand focused on wellness and recovery that harness the powers of essential oils and all-natural ingredients.
3. [Dulc calm Skincare](#): Grounded in a mission to create quality, multitasking skincare products for people on the go. Their hero products include Multitastic Balm, Sink Free Facial Kit, and Walk Out Clean Wipes.
4. [Everyday For Every Body](#) found white space in the sunscreen market with an inclusive and affordable sunscreen and Australian lifestyle brand based on superfood-infused products.
5. [Olive +M](#) is an all-natural skincare brand focused on bringing clean ingredient olive oil-based products to the market.
6. [Pholk](#): Inspired by the folk beauty and botanicals of the African Diaspora, Pholk creates natural vegan skincare products with non-comedogenic botanicals.
7. [SAHI Cosmetics](#): Formulated by a scientist from the Midwest that offers luxury makeup for every skin tone ensuring their products match three different undertones, from light to dark.
8. [SkinKick](#) has a mission to give everyone clear skin and confidence with safe and effective products. Their DUO and TRIO product systems are formulated with 99 percent natural ingredients and no harsh chemicals.
9. [Scotch Porter](#): A multicultural, unisex head-to-toe grooming brand offering products that are both less toxic and more effective than conventional brands.
10. [Terra Origin](#): Vitamin and powder supplements focused on high-quality, scientifically studied ingredients that can improve overall health and well-being.

[Applications](#) for the next program close on February 24, and the program will begin on May 6.

Photo: via Target



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Founder Kelly Kovack provides a fresh voice to the beauty industry with content from her perspective, and through her lens. BeautyMatter also publishes highly curated news and exclusive original pieces by thought leaders and beauty insiders.

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## **EXHIBIT C**



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## Sahi Cosmetics participating in University of Michigan's Desai Accelerator

By Deanna Utroske

25-Jan-2017 - Last updated on 31-Jan-2017 at 02:28 GMT



image courtesy of Sahi Cosmetics

RELATED TAGS: Entrepreneurship, Sahi cosmetics

The color cosmetics startup is among only five businesses invited to join the Winter 2017 cohort of the Desai Accelerator, a program designed to help passionate entrepreneurs, like Sahi Cosmetics founder Sheleen Sahi, succeed.

Beauty brands and services that cater to underserved consumers are becoming a big business and changing the industry landscape. Sahi Cosmetics is poised to be a part of the movement.

Sheleen Sahi launched her eponymous makeup brand at the start of 2016 to meet the needs of beauty consumers with olive and yellow under tones to their skin. "Women of Hispanic, Indian, Arabic, Asian, and Mediterranean decent find it difficult to match products with their complexions because most companies target Caucasian skin tones," the Sahi Cosmetics site explains.

It's that mission the company will work to expand on at the University of Michigan's Desai Accelerator.

### Support system

"Entrepreneurs are running fast in many different directions fueled by creativity and energy. Receiving guidance and support at the right time is key to becoming a successful entrepreneur," Angela Kujava, the accelerator's incoming managing director, says in a press release.

Sahi Cosmetics received Kickstarter funding from seven founding sponsors. Now, as part of the Desai Accelerator the company will receive an additional \$25,000. Office space, mentorship, and business resources like cloud credits, legal advice, and HR services are also part of the opportunity.

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degree just last year. In her bio on the Sahi site, she notes that her "background in biology, chemistry, engineering, as well as research helped me transition into the role of a cosmetic developer and founder."

Besides Sahi Cosmetics, startups participating in the Desai Accelerator this term include, Circadian Risk (a mobile software), an app called Food Stand, ScoutDay (networking for high school athletes and college coaches), and Warmilu (non-electric warming tech).

#### New management

Angela Kujava has just come on board as the Desai Accelerator's managing director. Most previously Kujava was director of innovation at application development firm Logic Solutions. She's long been a supporter of founders and startups, and the University of Michigan is grateful she'll be leading the accelerator.

*"Angela is the ideal leader to forge the future direction of the Desai Accelerator and help the program grow against the backdrop of an ever-evolving entrepreneurial landscape."* Stewart Thornhill, executive director of the Zell Lurie Institute, says in the press release. *"Her strong background in technology and startup consulting will be integral to the success of our entrepreneurs."*

As for Kujava, she's ready to set to work and help advance businesses like Sahi Cosmetics: *"We have exceptional startups in our Desai community, including several founded by Michigan alumni, and I am excited to begin the work of helping them reach the next stage,"* Kujava says.

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## **EXHIBIT D**

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# Xconomy

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## Sahi Cosmetics Offers Science-Backed Products for Olive Skin Tones



**Sarah Schmid Stevenson**  
September 6th, 2017

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Shelly Sahi, founder and CEO of **Sahi Cosmetics**, thought she wanted to be a doctor. It wasn't until she finished her undergraduate studies at the University of Michigan that she realized how burnt out she was—and that a career in the medical field was actually her parents' dream, not hers.

"I discovered entrepreneurship later because I didn't think it would be an option," she explains. "I have a very science-y background, and entrepreneur was not on the list of careers I was allowed to explore."

After a heart-to-heart with her parents, Sahi changed course and instead ended up landing a job in material science research at Ford. She worked her way up to a position in the automaker's business office and took classes at night, earning an MBA from U-M in less than three years.

"I loved new car technology and thought I'd stay in luxury goods for the rest of my life," she says. But then she was bitten by the entrepreneurial bug after taking a few innovation courses. In 2015, she went to the university's **Zell Lurie Institute for Entrepreneurial Studies** with an idea.

"I had always done people's makeup for proms and weddings for fun," Sahi says. "I knew I had a problem finding makeup to match my olive skin, but so did other ladies with brown skin." If someone complimented Sahi on her lipstick and asked about the brand and shade, she would tell them to get a pen and paper, because it was a custom mix of five lipsticks she had blended together.

So she pitched Zell Lurie on a line of beauty products for ethnic skin tones, particularly those with olive or yellow undertones—typically women of Arabic, Indian, Pakistani, Mediterranean, and Hispanic descent—that would incorporate her material science knowledge. Most makeup is formulated for Caucasian skin, Sahi points out, resulting in options that require additional blending to flawlessly match non-white skin.

"It felt really natural talking about the issues us brown girls have; it felt really easy," she recalls.

The folks at Zell Lurie loved the idea, she says, and helped her create a framework for the company. Sahi Cosmetics officially launched after a successful **Kickstarter campaign** in 2016 and late last month, the student-led **Zell Lurie Founder's Fund** doubled down on its support by announcing it had made a \$100,000 investment in Sahi's company.

The company's website went live in May, and it carries a full line of products: concealer, foundation, eye shadow, blush, mascara, lipstick, and more. The prices skew toward the premium end of the spectrum, but they're not unreasonable. (Tubes of liquid lipstick are priced at \$24.50, for example, and the company's newly released velvet finish diamond foundation clocks in at \$45.)

Fifty-two percent of the multi-billion-dollar annual cosmetics industry is made up of customers with "tan to deep tones" in their skin, Sahi says, and she sees a big opportunity for smaller beauty brands like her company.

"It's really hard to cater products to all skin tones," she says. "Companies like L'Oreal are backing out of research and development and moving toward acquisition because they can't compete with niche brands that are doing it really well."



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Sahi says she'd be open to an acquisition, but only if she could stay on as the company's CEO to make sure the quality of her trademarked, science-backed products doesn't suffer. Sahi Cosmetics also emphasizes inclusivity, a sentiment that she says her customers appreciate.

variances is essential to discover the right decision-makers in support of biologics or biosimilars

IBM WATSON

"Twenty-seven percent of our customers are male because of how open and engaging our brand is, and I wouldn't want to lose that," she adds.

The four-person company is currently operating out of Ann Arbor's **Startup Garage**. Between U-M's **Desai Accelerator**, where Sahi Cosmetics was a member of the winter 2017 cohort; Zell Lurie; and assorted grants and business competition prizes, the company has so far raised a total of \$200,000. Sahi says she plans to spend the new investment capital on an "aggressive marketing strategy" and further product development.



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Shelly Sahi, who earned an MBA from UM last year, founded Sahi Cosmetics to target women with olive and yellow undertones, who may be of Arab, Indian, Pakistani, Mediterranean and Hispanic descent, with poor makeup options.

The Zell Lurie Founders Fund at the University of Michigan has made a seed investment of \$100,000 in Ann Arbor-based Sahi Cosmetics LLC, a startup that was part of last winter's cohort of companies at the Desai Accelerator.

The accelerator is a joint venture between the Zell Lurie Institute at UM's Ross School of Business and the school's College of Engineering.

The investment from the fund will help the company expand its product line for women with medium skin tones. Earlier this year, Sahi Cosmetics won the top prize of \$27,000 at the Michigan Business Challenge, a business-plan competition at UM, and got an investment of \$25,000 as part of its acceptance into the Desai Accelerator.

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After working at Ford Motor Co. for two years, originally in the automotive industry, Sahi decided to graduate studies to advance her career at the [Ford Motor Co.](#), based in Dearborn, but got the entrepreneurial bug at Ross' Zell Lurie Institute for Entrepreneurial Studies.

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Sahi's company targets an underserved niche. Most cosmetics on the market are made for Caucasian women with pink undertones to their skin. She says that leaves women with olive and yellow undertones, who may be of Arab, Indian, Pakistani, Mediterranean and Hispanic descent, with poor makeup options.

A former materials engineer at Ford who has had this problem herself, Sahi saw an opportunity to use her science background to produce custom blends at scale.

"Growing up, I loved reading fashion magazines, but none of the women looked like me. I never want another girl to be left out in that way," Sahi, who is of Indian descent, said in a press release. Products are sold directly at [sahicosmetics.com](#) and on Amazon.com.

The Founders Fund invests in companies founded by Ross students and recent alumni. It was created by a 2015 gift from business magnate Sam Zell.

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July 17, 2017 11:54 AM

**Wireless audio, health care platform among 2nd round of Desai Accelerator program this year**

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Courtesy of Desai Accelerator

Shelly Sahi, CEO of Sahi Cosmetics, makes a pitch during Desai Accelerator's winter 2017 demo day.

Ann Arbor-based Desai Accelerator is working with its second cohort of the year.

The joint venture between the [University of Michigan](#)'s Ross School of Business and the school's College of Engineering has previously selected one group of startups per year for its program, which provides mentoring, investments and other services to fledgling companies. But this year Desai led a cohort of five startups in the [winter](#) and has selected another four to participate in a second round this summer. The session runs through October.

The companies are:

Ascape Audio, a creator of wireless audio products

Find Your Ditto, a mobile platform that helps connect people with similar chronic illnesses

Gwydion, a virtual reality and augmented reality software developer

TwoScoreTwo, which develops products that enable more secure, expedient online commerce

It's a trend among accelerators like Desai, which started in 2015, to increase the number of mentorship rounds they hold per year, said Angela Kujava, Desai's managing director.

"We understand our programming a lot better now, of course, than that first cohort (in 2015), and understand what we're capable of and how our partners at the university are capable of supporting us, as well," she said.

Each startup receives \$25,000, mentor support and Ann Arbor office space, in addition to a curriculum that aims to help the young companies grow to a place where they can seek outside investors. They will also pitch to potential investors at a Desai Demo Day.

Funding for the program is provided by the Desai Sethi Family Foundation, the Davidson Foundation, the Wadham family and the Michigan Economic Development Corp.

The [2018 application period](#) will begin in October.

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October 12, 2017 07:28 AM

**Sahi Cosmetics wins \$100,000 in Rise of the Rest pitch competition**

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REPRINTS

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- Shelly Sahi created product line for women of ethnic medium skin tones
- Company gets second \$100,000 investment this year
- 8 startups competed in the competition in Ann Arbor

Sahi Cosmetics LLC won the \$100,000 grand prize at the Rise of the Rest Road Tour pitch competition at the Michigan Theater in Ann Arbor on Wednesday evening.

Owner Shelly Sahi created the product line for women of ethnic medium skin tones. The Ann Arbor-based company markets the makeup to women with olive and yellow undertones who may be of Arab, Indian, Pakistani, Mediterranean or Hispanic descent, [Crain's reported](#).

The Ann Arbor-based startup has gotten a lot of attention this year, including [a \\$100,000 investment](#) from the Zell Lurie Founders Fund at the [University of Michigan](#) in August.



Shelly Sahi (center), founder of Ann Arbor-based startup Sahi Cosmetics LLC, accepts her \$100,000 prize at the Rise of the Rest Road Tour pitch competition in Ann Arbor on Wednesday.

We hope to raise \$1 million for our seed round."

Sahi, a former materials engineer at [Ford Motor Co.](#), had problems finding makeup that worked for herself and saw an opportunity to use her science background to produce custom blends at scale.

The Rise of the Rest competition is led by Steve Case, the chairman of Washington, D.C.-based investment firm Revolution LLC and co-founder and former chairman of AOL Inc. The judge panel included Case, *Hillbilly Elegy* author J.D. Vance, Revolution partner David Hall, Revolution Vice President Ashley Larson, [University of Michigan Ross School of Business](#) Dean Scott DeRue and Troy-based The Kresge Foundation Vice President Robert Manilla.

The pitch competition finalists included the following startups:

SkySpecs LLC, Ann Arbor - Danny Ellis, CEO: Company automates predictive maintenance of energy infrastructure with drones.

Pitstop, Ontario - Shiva Bhardwaj, CEO: Pitstop predicts vehicle failures before they happen.

Genomenon Inc., Ann Arbor - Mike Klein, CEO: Genomenon creates interpretation software for diagnosing and treating cancer.

Inmatech Inc., Ann Arbor - Les Alexander, CEO: The company commercializes novel high-performance supercapacitors for energy storage systems.

Warmilu LLC, Ann Arbor - Grace Hsia, CEO: Warmilu provides nonelectric warmth to those who need it most.

SurClean Inc., Wixom - Susan Sprentall, founder, president and CEO: The company's laser surface prep removes paint, replacing traditional methods.

Civionics Inc., Ann Arbor - Gerry Roston, CEO: Civionics improves manufacturers' profitability by reducing downtime.

Case kicked off the Ann Arbor stop of his Rise of the Rest tour with a breakfast session at which he made his case for [why the Midwest should be home to the next wave of tech startups](#). Later, in a panel discussion that included Detroit billionaire Dan Gilbert, he talked about Ann Arbor and Detroit's increasingly important role in entrepreneurship and its missing cohesion.

## RELATED ARTICLES

[Case in Ann Arbor: Midwest should be home to next wave of tech startups](#)

[Ann Arbor, Detroit must work together to further investment, Rise of the Rest p...](#)

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**Tara Cavanaugh** • 3 years ago

I would like to respectfully suggest that "ethnic medium skin tones" sounds both dated and redundant. We all have an ethnicity. "Ethnic skin tones" is something my grandma would say (and she has, as she's white and I'm half-Hispanic). Thank you for considering a change.

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**E M Parmelee** • 3 years ago

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## TWENTY IN THEIR 20S

### CRAIN'S 20 IN THEIR 20S 2019



Jacob Lewkow

#### Sheleen Sahi, 29

*CEO & Founder, SAHI Cosmetics*

Laura Cassar

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Most entrepreneurs have an "aha" moment that motivates them to make their dream a reality. For 29-year-old Sheleen Sahi, that moment came in the form of a brain tumor.

Sahi always had an obsession with beauty and a frustration with the limited products available to women of color like herself. After emergency brain surgery in August 2015 to remove a hemorrhaging tumor on her pituitary gland, Sahi — a biology major and former materials engineer at Ford Motor Co. — realized nothing compared to the passion she felt for beauty and fashion. Three days after the surgery, she was back in her MBA Operations

class at the University of Michigan's Ross School of Business, but in her personal time she started using her science background to formulate cosmetic products based on skin undertones.

Sixteen months later, the day after she completed her MBA, Sahi walked into Desai Accelerator, a 16-week program for startups that provides funding, mentorships and resources.

Since then, Sahi said, "The hustle never stops."

First came the funding, including an investment of \$25,000 as part of acceptance into Desai and another \$27,000 when she took the top prize at the Michigan Business Challenge. The Zell Lurie Founders Fund at UM made a seed investment of \$100,000. And then, just when Sahi thought she was "over" doing



Case's Rise of the Rest, with a \$100,000 prize. Sahi won first place.

Next came making connections. With an arm covered in lipstick and eyeshadow swatches, Sahi attended Gen Beauty Expo in Toronto. She was handing out her business card and asking women — about 2,000 of them — to follow her on Instagram when an older European man approached her and asked about her company. She gave him her 30-second elevator pitch. He turned out to be Marcelo Camberos, the CEO of ipsy, a cosmetics subscription service. He liked what he heard and put Sahi Cosmetics in two of ipsy's monthly subscription Glam Boxes.

Word started to spread. A colleague from Rise of the Rest told her about the Target Takeoff Accelerator Program, to which she applied and was accepted. While her luxury line wasn't right for the mass merchant, they liked her innovative idea enough to help her seal the deal she was working on with Macy's, getting her into two Los Angeles stores on a one-month contract.

"Macy's is a great platform to tell our story," Sahi said. "You have to take advantage of every opportunity."

This June Sahi will open a flagship store in Dearborn that will both sell products and offer services.

"I never anticipated so many die-hard fans," Sahi said. "To know that someone is using my product every single day is what I'm most proud of. I'm part of their morning routine and that's really satisfying to know."



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## **EXHIBIT I**

# TWIN CITIES BUSINESS Q

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Participants of Target Takeoff gathered for a group meeting. (Photo courtesy of Target)

## TOURISM

### Target Attracts 10 Beauty Startups For Third-Annual Target Takeoff Accelerator Program

Participating brands set to receive assistance with pitch and product through the annual program include skincare companies from Australia, a New York-based haircare company, and more.

By Amanda Ostuni

January 30, 2019

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Target prides itself on developing new brands and products—a number of which eventually land in stores—through business accelerators and outreach efforts. At the close of January, the Minneapolis-based retailer is kicking off its third annual accelerator program Target Takeoff with a new cohort of beauty and self-care product makers.

The ten companies were selected through a worldwide search. With Target having focused the Takeoff program on beauty products last year, and expanded the scope of emerging beauty categories this year, their offerings range from all-natural skincare to wellness remedies, to beauty supplements, and more.

Through Target Takeoff, which launched at Target's headquarters this week, the startups will receive mentoring and workshop experiences to ultimately refine their niches and



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products. The accelerator will culminate in Minneapolis on February 28 for a product showcase.



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## Sewing And Serving With Love

At the start of the pandemic earlier this year, Faribault Woolen Mill Co. sewed masks for 5,000-plus Caribou Coffee employees. Now, the two iconic Minnesota brands are partnering on an exclusive merchandise collection.



Previous Target Takeoff participants have found their way onto Target's shelves. Such was the case for skincare brand Oars + Alps, which will have its products hit Target shelves in February.

The ten new businesses in this year's program are:

### Allyoos

- From New York City, New York
- Makes clean-ingredient hair-care products (such as a one-step wash solution) for all hair types

### Black Chicken Remedies

- From Sydney, Australia
- Makes essential oils and natural ingredient-based remedies for skin, hair, body and mind

### Ducalm Skincare

- From Southport, Connecticut
- Makes skincare products for when you leave the gym

### Everyday for Every Body

- From Sydney, Australia
- Makes sunscreen products and brands itself as a lifestyle company

### Olive+M

- From Austin, Texas
- Makes olive oil-infused skincare products

### Pholk



- From Jersey City, New Jersey
- Makes natural vegan skincare products with non-comedogenic botanicals

### Sahi Cosmetics

- From Plymouth, Michigan
- Makes luxury makeup products for every skin tone

### SkinKick

- From Dallas, Texas
- Make skincare products focused on acne relief

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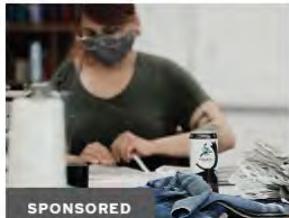
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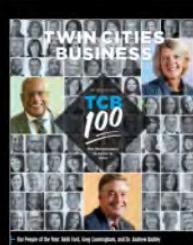
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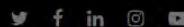
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## **EXHIBIT J**

# Cosmetics company wins best business at Michigan Business Challenge

SARAH RIGG | WEDNESDAY, FEBRUARY 22, 2017

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Zell Lurie Institute executive director Stewart Thornhill with Michigan Business Challenge winner Shelly Sahi.

A cosmetics company focused on Arab, Latina, and Indian consumers was named winner of the [Michigan Business Challenge](#) on Friday, Feb. 17, after a multi-round pitch competition.

Sponsored by the University of Michigan's (U-M) [Zell Lurie Institute](#) (ZLI), the Michigan Business Challenge gives U-M student teams the opportunity to win more than \$85,000 in cash prizes and get feedback from business leaders. Challenge winner [Sahi Cosmetics](#) took home a \$25,000 award for best business, plus an additional \$2,000 for outstanding presentation.

Shelly Sahi brainstormed her business idea in December 2015 after consulting with a mentor at ZLI. She determined that there was no direct competitor for the market she was targeting – primarily Arab, Latina, and Indian women with medium skin tones.

"I've been a makeup artist my whole life, and I know that it's hard to find makeup for women with yellow and olive undertones to their skin," Sahi says.

She says she thinks her pitch stood out to the judges because of her enthusiasm and her attention to market research, which showed there was a gap to be filled.

"If it's something you truly believe in, something you really want to see come to fruition, that's what comes through in your pitch," Sahi says.

Sahi completed her MBA at U-M's Ross School of Business and currently runs her business out of U-M's Desai Accelerator. She worked at Ford before she started her MBA studies and initially thought she would return there after she graduated.

"I wasn't thinking of being an entrepreneur," she says. "It started as something on the side but turned into so much more."

After funding a successful Kickstarter campaign in 2016, she is now working at her cosmetics business 70 hours a week, with three interns working part-time under her.

Sahi says the prize money will help her develop an "aggressive" go-to-market strategy. Short-

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term plans include hosting pop-up markets in the Detroit metro area this year, and a five-year plan that includes opening a flagship store in Detroit.

In addition to the best business plan track, the Michigan Business Challenge also offers an "Impact Track" that supports teams with a social or environmental mission. The winner of the Impact Track was AIMTech, a startup that has developed an affordable, high-quality, low-tech pressure ventilator that requires no electrical power. The business' aim is to prevent deaths caused by respiratory illnesses in infants living in low-income countries.

**Sarah Rigg is a freelance writer and editor based in Ypsilanti Township. You may reach her at [sarahrigg1@gmail.com](mailto:sarahrigg1@gmail.com).**

**Photo by Doug Coombe.**

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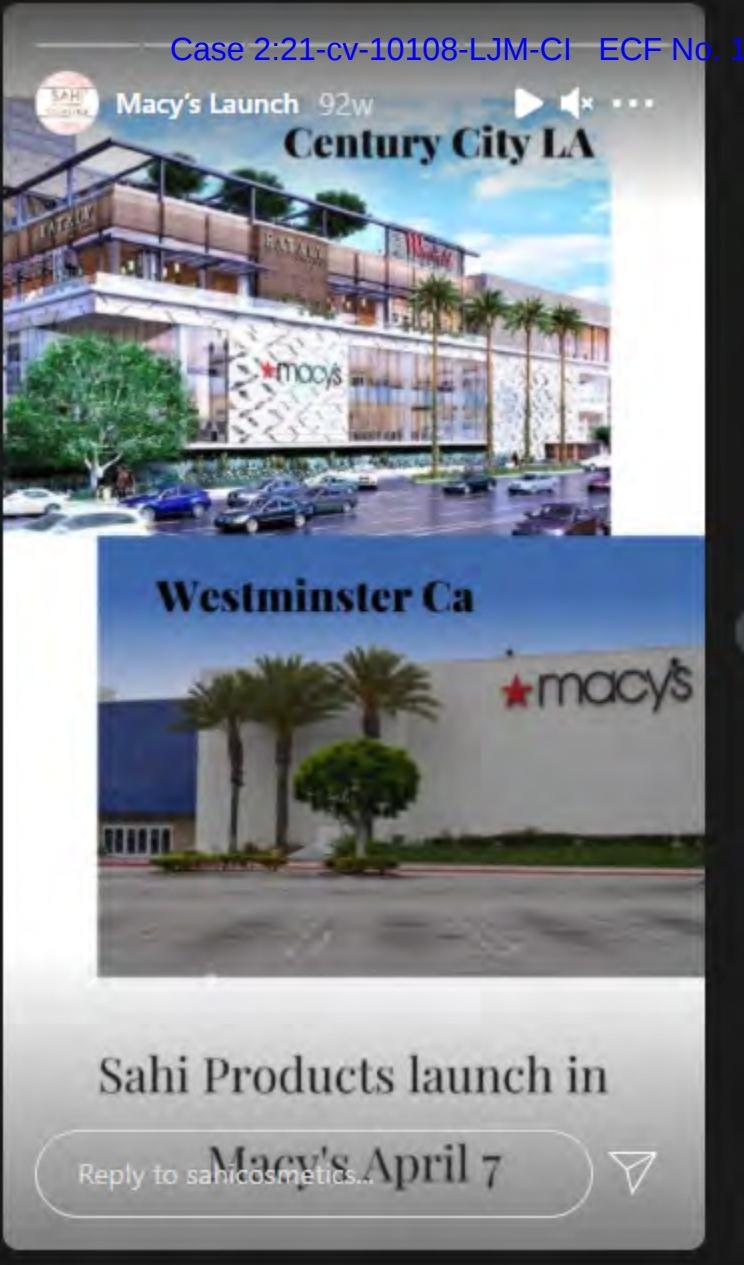
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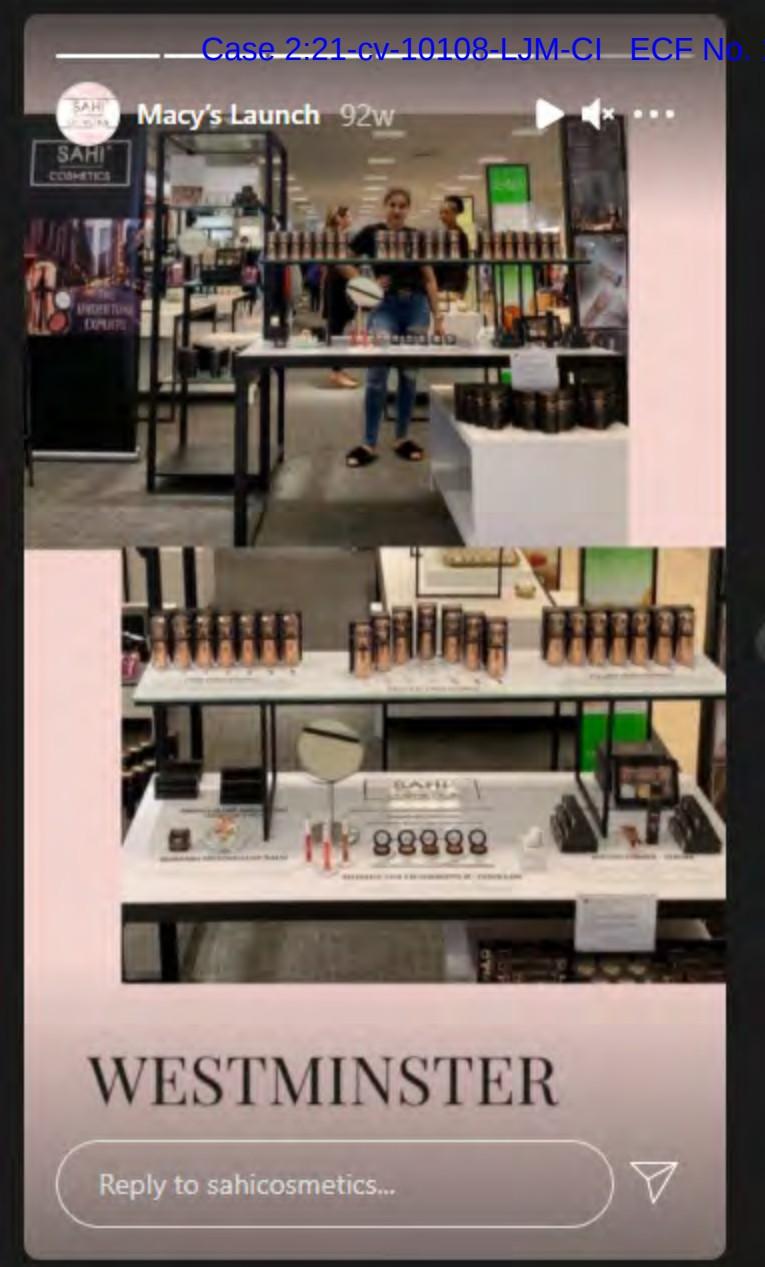
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## **EXHIBIT L**



Jeanette M. Braun <jmraun@brauniplaw.com>

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Jeanette M. Braun <jmraun@brauniplaw.com>

Mon, Jan 11, 2021 at 8:23 PM

Draft

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Date: Fri, Aug 23, 2019 at 9:57 AM  
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To: [shelly@sahicosmetics.com](mailto:shelly@sahicosmetics.com) <[shelly@sahicosmetics.com](mailto:shelly@sahicosmetics.com)>



Hello Shelly,

On behalf of the Michigan Minority Supplier Development Council (MMSDC), its Board of Directors, members, and staff, I would like to congratulate you on being selected as one of our Motor City Honors 2019 "Twenty to Watch."

The newly revamped, repurposed and reinvigorated Motor City Honors event (formerly Motown Live) takes place during the Congressional Black Caucus Foundation's Annual Legislative Conference (CBC) in Washington, D.C. on Friday September 13<sup>th</sup> from 7:00pm to 11:00pm. The purpose of the event is to highlight the diversity, strength, and influence of Michigan's dynamic congressional delegation, and to honor well deserving individuals and businesses that have distinguished themselves in various fields. Historically the CBC event has been attended by members of Michigan's Congressional and State Legislative Delegations, as well as luminaries of politics, business, and entertainment from across the nation.

As part of our Motor City Honors event which features five (5) top iconic business and community honorees, we added "Twenty to Watch" to highlight emerging industry and community leaders. This prestigious list celebrates local business professionals, community activists and entrepreneurs who have exhibited the power to lead and cultivate change. These individuals participate in community service, mentorship, and inspire others through their passion and skills. So, congratulations and thank you for your impact.

We hope you will accept this special honor and personally be in attendance as we celebrate you and other influential leaders at CBC. Please RSVP to Bridget Daly ([bdaly@minoritysupplier.org](mailto:bdaly@minoritysupplier.org)) no later than August 30th. You and one guest may attend free of charge. We encourage you to also invite friends and family to celebrate your success! Additional tickets may be purchased at

<https://www.eventbrite.com/e/motor-city-honors-michigan-delegation-cbc-reception-tickets-69293810653>

Through the following link <https://minoritysupplier.org/headshot-submission/> Please submit a compelling 180-word bio and professional headshot. The deadline for submission is **Tuesday, August 27<sup>th</sup>**. Head shots must be in JPEG or PNG format with a minimum of 300 dpi.

Again, congratulations. We look forward to celebrating you!

Sincerely,



Michelle Sourie Robinson

President and CEO

Thank you.

Sakija



**Sakija Wilkinson**

**MBDA Research Analyst & MMSDC Customer Service Coordinator**

**100 River Place Drive | STE. 300 | Detroit, MI 48207**

 313-262-7572 Direct |  313-338-3615 Fax

[swilkinson@detroitmbdacenter.com](mailto:swilkinson@detroitmbdacenter.com) | [swilkinson@minoritysupplier.org](mailto:swilkinson@minoritysupplier.org)

[www.minoritysupplier.org](http://www.minoritysupplier.org)



**Attend the 2019 ACE Awards**

**Friday, October 4<sup>th</sup> at Suburban Collection Showplace**

<http://awards.minoritysupplier.org>

View this years ACE Ambassadors.



100 River Place Dr., Suite 300  
Detroit, MI 48207  
[minoritysupplier.org](http://minoritysupplier.org)

--  
**SHELLY SAHI**

CEO/FOUNDER | 734 837 1222  
<https://www.linkedin.com/in/sheleensahi/>  
[sheleen@sahicosmetics.com](mailto:sheleen@sahicosmetics.com)  
<https://sahicosmetics.com>

## **EXHIBIT M**

Hello Subscription Best Subscription Boxes & Subscription Box Reviews

AWARDS FIND REVIEWS COUPONS SPOILERS MORE

Last updated by Hello Subscription on September 28, 2018. Subscription Box News / FabFitFun Box News



## FabFitFun Fall 2018 Edit Sale Spoilers!

Hello Subscription may earn compensation via links in this post. [Read the full disclosure →](#)



The [FabFitFun Box](#) Fall 2018 Edit Sale is coming soon! Select Members will have Early Access beginning October 1. All members will have access beginning October 4!



Every season, members have access to an exclusive sale called the "Edit" containing amazing products for huge discounts, 25%-70% off! Each sale will be open for a limited period of time and functions just like a seasonal add-on sale (**with automatic checkout!**)!

The sale will feature beauty, fashion, fitness, wellness, and lifestyle items at 30% to 70% off.

You can [subscribe now](#) to get access! New members can save \$10 on the Fall Box with code **FAB10!**

### TOP SUBSCRIPTIONS



Best Knife Subscription Boxes for 2021



Best CBD Subscriptions & Boxes



2021's Best Subscription Boxes for Gamers

**HOW IT WORKS**

## SELECT YOUR FAVORITES

Shop over 100 products  
between **30%-70% off!**

## NO CHECKOUT REQUIRED

All products in your cart will be  
automatically billed on October 9.

## GET FREE SHIPPING

Shipping is **FREE** for any orders over  
\$25 within the contiguous U.S.

Edits are just like Add-Ons and you'll be auto-billed for everything at the end of the sale. Billing begins the morning of October 9.

Here are some spoilers for the sale:



**BTB Los Angeles Jewelry Dish \$9 (Original \$38)**

- Mint hexagon: Hello Gorgeous
- White heart: Positive Vibes



**Frasier Sterling Rosé Huggie Trio \$14 (Original \$79)**

- Includes: 3 pairs of earrings

Left to right:

- 0.75 inch drop
- 0.5 inch drop
- 0.5 inch drop





**Summer & Rose Ella Crossbody \$24 (Original \$72)**

-Colors: Black or Burgundy

-8" H x 11" L x 4" W

-Vegan leather

Care instructions:

-Soak a cloth or sponge in water and wipe down the surface

-Let air dry

-Do not put in wash

-Do not bleach

-Do not dry clean



**Tease Tea Pumpkin Spice Tea \$7 (Original \$13.95)**

-Ingredients: Black tea, cinnamon, apple, orange, rosehip pieces, hibiscus, and calendula

-Up to 20 servings

-Dairy-free, wheat-free, GMO-free

-All-natural flavors



Erin Conner Wellness Log \$9 (Original \$12)

-5.7" x 8.25"

- 80-page count: 1 title page, 2 pages of wellness goals, 72 pages of monthly progress, 4 lined pages, 1 quote page
- Built-in pocket
- Watercolor front cover with quote, "Energy flows where attention goes"
- 6 months of wellness planning
- Rose gold sticker sheet included



**Sahi Cosmetics MYSTIC Primer + Serum \$9 (Original \$32)**

- 1 fl oz/30 ml
- Cruelty-free
- Paraben-free
- Made in Korea
- Lightly fragranced

How to Use:

1. Test patch before using.
2. Cleanse skin before application.
3. Squeeze out a dime size amount on fingertips and work into skin evenly before applying makeup.

**Visit FabFitFun Box to find out more!**

BOX REVIEW ★★★★☆ 4/5

## FabFitFun

FabFitFun VIP subscription box is a quarterly lifestyle subscription box from FabFitFun. The VIP box features a mix of beauty, fashion, fitness, wellness and home products that help you feel good from the inside out. The box includes full-size products and premium items worth over \$100.

**Ships** From US to US/CA/UK.  
**Shipping** Free Shipping to the US, \$8 to Canada, Puerto Rico, Alaska, Hawaii. \$10 to United Kingdom

Subscription Boxes for Women / Womens Lifestyle Subscription Boxes

**\$49 99 per quarter** [SUBSCRIBE](#)  [COUPONS](#) Take \$10 off your first box. Use coupon code **FAB10**.



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**COMMENTS**

Write a comment \*

eg.I love this box. It makes me smile...

dear:

Grab the best new year subscription box deals this week before they disappear!

January 2021





Grab the best new year subscription box deals this week before they disappear!

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Grab the best new year subscription box deals this week before they disappear!

January 2021



COMMENTS

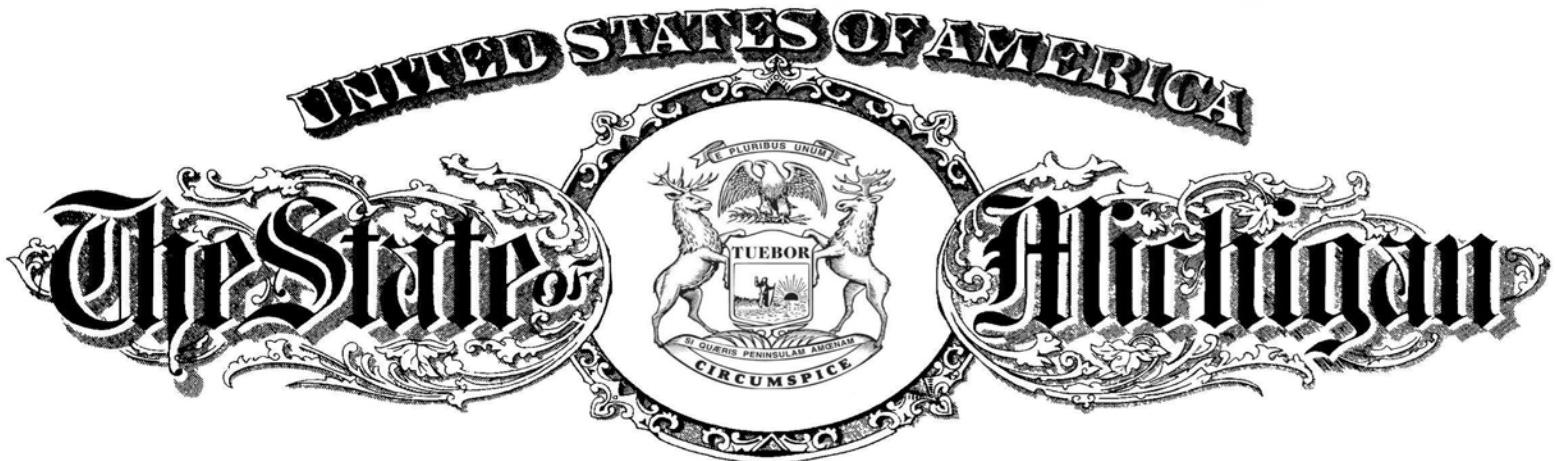
Write a comment \*

eg.I love this box. It makes me smile...

Name \*



## **EXHIBIT N**



**Department of Licensing and Regulatory Affairs**  
Lansing, Michigan

**CERTIFICATE OF REGISTRATION**

On December 11, 2020 the Trademark consisting of Design Only and described as follows:  
**NO WORDS**

**COLOR MARK FOR IRIDESCENT PEARL MULTICOLOR HUE WITH A BLUE TO PINK SHIFT. COLOR OF IRIDESCENT PEARL MULTICOLOR HUE WITH A BLUE TO PINK SHIFT IS CLAIMED AS A FEATURE OF THE MARK.**

was registered in this office in accordance with the provisions of 1969 PA 242 on behalf of  
**SAHI COSMETICS L.L.C.,**

whose business address is  
**9079 COUNTRYWOOD DR,  
PLYMOUTH , MI 48170.**

Said mark was first used in commerce anywhere on November 9, 2017, and was first used in commerce in Michigan on November 9, 2017. The mark is appropriated to the following class of services: 50, and is used in connection with the following:  
**MAKE UP PRIMER.**

The registration shall remain for a term of ten years from the date of registration, or renewal thereof, unless assigned or canceled in the manner provided by law.

The identification number assigned by this office to said mark is 802571178.



In testimony whereof, I have hereunto set my hand,  
in the City of Lansing, this 15th day of December, 2020.

A handwritten signature in cursive script that reads "Linda Clegg".

Linda Clegg, Interim Director

Corporations, Securities & Commercial Licensing Bureau